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June 30, 2014

Miriam B. Ingenito, Acting Director  
California Department of Toxic Substances Control  
P.O. Box 806  
Sacramento CA 95812-0806  
Sent via e-mail to [SaferConsumerProducts@dtsc.ca.gov](mailto:SaferConsumerProducts@dtsc.ca.gov)

Dear Ms. Ingenito:

The BlueGreen Alliance is submitting these brief comments to the California Department of Toxic Substances and Control on the Priority Products Draft Regulatory Concepts and Topics for Stakeholder Input.

The BlueGreen Alliance (BGA) is a strategic partnership launched in 2006 by the United Steelworkers (USW) and the Sierra Club to address the historic challenges posed by global economic and environmental crises and to help lead a powerful movement for social change. Today, BGA includes 11 large unions and five national environmental groups, collectively representing nearly 16 million members and supporters. The BGA partnership is dedicated to expanding the number and quality of jobs in the clean economy including growing the number and quality of manufacturing sector jobs making products without toxic chemicals. In addition to USW and Sierra Club, the BGA membership now includes the Amalgamated Transit Union; the American Federation of Teachers; International Union of Bricklayers and Allied Craftworkers; Communication Workers of America; Environmental Defense Action Fund; National Wildlife Federation; Natural Resources Defense Council; Service Employees International Union; Sheet Metal, Air, Rail and Transportation Union; Union of Concerned Scientists; United Association of Plumbers and Pipefitters; United Auto Workers; United Food and Commercial Workers; and the Utility Workers Union of America.

Our comments focus on the second question in Topic Two: Are there functionally acceptable alternatives to this Priority Product?

Ventilation and personal protective clothing and equipment cannot adequately protect the health of all of the workers who may be exposed to unreacted diisocyanates during construction, renovation, repair, or demolition of structures that contain spray polyurethane foam. We believe that the risk of irreversible sensitization, asthma and other lung diseases to construction workers and the

emergency personnel who respond to building fires compels the DTSC to consider a broad definition of acceptable alternatives.

Rather than asking if there are safer alternatives to unreacted diisocyanates in spray polyurethane foam, the BlueGreen Alliance recommends that the review of alternatives include other forms of insulation including cellulose and cotton and other methods of roofing, filling and sealing of voids and gaps.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlotte Brody". The signature is fluid and cursive, with a large loop at the end.

Charlotte Brody, RN  
Vice President of Health Initiatives  
BlueGreen Alliance